

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Raymond C. Staley	20-13812 AMC
<hr/> Debtor(s)	Chapter 13 Proceeding
PENNYMAC LOAN SERVICES, LLC	
Movant	
v.	
Raymond C. Staley and Scott Waterman, Esquire	
Respondents	

CERTIFICATION OF DEFAULT

PENNYMAC LOAN SERVICES, LLC, a secured creditor in the above captioned bankruptcy case, by and through its counsel, Jill Manuel-Coughlin, Esquire of the law firm of POWERS KIRN, LLC, hereby files this certification, and states:

1. I am the attorney responsible for handling the instant matter for PENNYMAC LOAN SERVICES, LLC, and I have sufficient knowledge to make this certification on its behalf.
2. On 09/30/2021, an Order was issued by this Court approving the Stipulation resolving PENNYMAC LOAN SERVICES, LLC's motion for relief from stay, a copy of which Order is attached hereto as **EXHIBIT A**. The Order provides for the cure of post-petition arrearage, and that in the event the Debtor fails to make the payments the secured creditor is permitted ex-parte relief to vacate the stay, with notice to the trustee, debtor(s), and debtor's attorney, if any.
3. Debtor(s) has/have failed to comply with the aforesaid order by either missing payments and/or by failing to make the correct payments as summarized on the Notice of Default which was sent to all interested parties on 02/09/2022. A copy of the Notice of Default is attached as **EXHIBIT B**.
4. This certification is being made in an effort to enforce the prior order of this court and to vacate the stay without numerous court appearances.
5. I certify the above statements to be true. I am aware that if the above statements are willfully false, I am subject to punishment.

RESPECTFULLY SUBMITTED,
POWERS KIRN, LLC

Dated: March 3, 2022

By: /s/ Jill Manuel-Coughlin

Jill Manuel-Coughlin, Esquire

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Attorney for Movant